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From: Mark Boucher [mboucher@pw.co.contra-costa.ca.us]  
Sent: Thursday, September 30, 2004 6:14 PM  
To: Billington, Tracie  
Subject: Comments on Integrated Regional Water Management Grant Program Guidelines for Proposition 50, Chapter 8.

Ms. Billington:

I am writing on behalf of the Contra Costa County Flood Control and Water Conservation District to provide comments on the Public Draft (8/16/04) Integrated Regional Water Management Grant Program Guidelines for Proposition 50, Chapter 8.

1. Integrated Regional Water Management Plan (IRWM Plan) Boundaries and Overlaps: The guidelines should explicitly address the issue of overlapping IRWM Plan boundaries. A grant application should not be penalized if its IRWM Plan boundary overlaps with another region. Agencies within smaller regions can more easily demonstrate the need for and execute integrated multi-objective projects. This is because in most cases, watersheds define water quality plans, watershed plans, habitat conservation plans, and flood plain management plans. Some smaller sanitary district boundaries and water district service areas are also defined by watersheds.

By "forcing" the move toward larger regions, smaller agencies with very viable and valuable projects will lose interest in the purpose of the grant program due to breath of competition for the grant funds. Also, smaller agencies may find little in common with a larger region simply because their boundaries may not extend further than the city boundaries.

The Eastern Contra Costa County area already has a functional equivalent of an IRWM Plan (dated 1996 and being implemented) and will be preparing an implementation grant application. In our brief experience in interacting with other Bay Area agencies, we have seen that there are other "sub-regions" with similar functional equivalents. We have also seen that it may take a while for the "greater-region" to produce a true IRWM Plan. The Bay Area is unique and has much more variety and diversity than other populated areas of the state in culture and in how the water agencies were established and operate.

We believe applications from "sub-regions" should not be scored lower than those from a "greater-region" if they meet the minimum criteria for an IRWM Plan and are of high quality. Please clarify in the final guidelines what must be done within a grant submittal or within an IRWM Plan to show that an overlap is reasonable, affective, and acceptable. We request that an IRWM Plan be allowed to provide an explanation as to why the overlap of regions is appropriate under its unique circumstance. We do not, however, believe that a project should be included in more than one IRWM Plan or grant proposal. The projects should make sense within the region they are proposed under.

2. IRWM Plan Standards, Objectives: The objectives of an IRWM Plan should not be required to include a description of the water supply and demand for the 20-year horizon unless water supply, or recycled water supply is in its own objectives. The main objectives of an IRWM Plan for a smaller region may have more to do with improving or sustaining drinking water quality than quantity. The "IRWM Plan Standard - Objectives" guidelines are written as if water supply demand is essential for all IRWMPs. The guidelines should be revised to make the "water supply demand" phrase an example of what should be included in the objectives.

Thank you for the opportunity to provide comments on the Proposition 50, Chapter 8 Draft Guidelines. If you have questions regarding these comments, please contact me at mboucher@pw.co.contra-costa.ca.us or (925) 313-2274.

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